

SEALED

CLERK'S OFFICE U.S. DIST. COURT
AT CHARLOTTESVILLE, VA
FILED

IN THE
UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
HARRISONBURG DIVISION
APRIL 2006 SESSION

APR 12 2006

JOHN E. MCORRAN, CLERK
BY: *[Signature]*
DEPUTY CLERK

UNITED STATES OF AMERICA :

v. :

KAMAL NIGEL WILLIAMS :

a/k/a "Creepy" :

MARLON ANTOINE BASSIL :

A/k/a "Red" :

JOSEPH RODNEY BROOKS :

a/k/a "Slim" :

a/k/a "Mr. Mook" :

FNU MNU LNU :

a/k/a "BG" :

STEPHEN ROBINSON :

a/k/a "Ace" :

a/k/a "Face" :

Criminal No. 5:06CR00014

In Violation of Title 21, U.S.C.
Section 841 and 846; Title 18,
U.S.C. Section 924(C).

INDICTMENT

Count One

The Grand Jury charges:

1. That, beginning on a date unknown to the Grand Jury, but as far back as approximately September, 2002, and continuing until the date of this Indictment, in the Western Judicial District of Virginia, and elsewhere, KAMAL NIGEL WILLIAMS, also known as "Creepy", MARLON ANTOINE BASSIL, also known as "Red",

JOSEPH RODNEY BROOKS, also known as "Slim" and as "Mr. Mook", a person whose first, middle, and last names are presently unknown to the Grand Jury (hereinafter "FNU MNU LNU"), also known as "BG", and STEPHEN ROBINSON, also known as "Ace" and as "Face", did knowingly combine, conspire, confederate, and agree among themselves and with other persons, both known and unknown to the Grand Jury, to knowingly and intentionally distribute, or possess with the intent to distribute 50 grams or more of cocaine base, or "crack", and to distribute 500 or more grams of cocaine hydrochloride (powder), both of which are Schedule II controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(iii).

2. The person known as "BG" is further described as an African-American male in his late 20's. "BG" is pictured on the hoodlifemoney CD jewel case insert entitled "A Day in the Life", on the back, in a picture labeled "G.boutmoney". He is also pictured on a business card for the band's manager in a four-person collage at the top center of the four photographs.

3. All in violation of Title 21, United States Code, Section 846.

Count Two

The Grand Jury Charges:

1. That, on or about June 3, 2005, in the Western Judicial District of Virginia, STEPHEN ROBINSON, also known as "Ace", did knowingly and intentionally

distribute 5 or more grams of a mixture or substance containing a detectable amount of cocaine base, also called "crack", a Schedule II controlled substance.

2. In violation of Title 21, United States Code, Section 841.

Count Three

The Grand Jury charges:

1. That, on numerous dates between mid-October, 2005, and January, 2006, in the Western Judicial District of Virginia, KAMAL NIGEL WILLIAMS, also known as "Creepy" did knowingly and intentionally possess a firearm in furtherance of drug trafficking offenses which could be prosecuted in a United States Court.

2. That the drug trafficking offenses to which this Count refers were a series of distributions of crack cocaine and possessions with intent to distribute. The firearm to which this Count makes reference was a handgun commonly carried in a pocket or tucked into the defendant's waistband. These drug trafficking offenses are distinct from all other drug trafficking offenses to which this Indictment refers.

3. In violation of Title 18, United States Code, Section 924(c).

Count Four

The Grand Jury Charges:

1. That, on or about January 6, 2006, in the Western Judicial District of Virginia, JOSEPH RODNEY BROOKS, also known as "Slim", did knowingly and

intentionally possess 50 or more grams of a mixture or substance containing a detectable amount of cocaine base, also called "crack", a Schedule II controlled substance, *w/intent to distribute, Rem*

2. In violation of Title 21, United States Code, Section 841.

Count Five

The Grand Jury Charges:

1. That, on or about January 6, 2006, in the Western Judicial District of Virginia, STEPHEN ROBINSON, also known as "Ace", did knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine base, also called "crack", a Schedule II controlled substance.

2. In violation of Title 21, United States Code, Section 841.

Count Six

The Grand Jury Charges:

1. That, on or about January 6, 2006, in the Western Judicial District of Virginia, STEPHEN ROBINSON, also known as "Ace", did knowingly and intentionally possess 5 or more grams of a mixture or substance containing a detectable amount of cocaine base, also called "crack", a Schedule II controlled substance, with intent to distribute.

2. In violation of Title 21, United States Code, Section 841.

Count Seven

The Grand Jury Charges:

1. That, on or about January 12, 2006, in the Western Judicial District of Virginia, KAMAL NIGEL WILLIAMS, also known as "Creepy", did knowingly and intentionally distribute cocaine hydrochloride, a Schedule II controlled substance.
2. In violation of Title 21, United States Code, Section 841.

Count Eight

The Grand Jury Charges:

1. That, on or about January 30, 2006, in the Western Judicial District of Virginia, MARLON ANTOINE BASSIL, also known as "Red", did knowingly and intentionally distribute 5 or more grams of a mixture or substance containing a detectable amount of cocaine base, also called "crack", a Schedule II controlled substance.
2. In violation of Title 21, United States Code, Section 841.

A TRUE BILL, this 12th of April, 2006.


FOREMAN


JOHN L. BROWNLEE
UNITED STATES ATTORNEY